

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN**

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ESTATE OF JAY ANDERSON, JR.  
by Special Administrator, Starkeisha DeLaRosa;  
J.A. minor child, through her next friend Starkeisha DeLaRosa,

Plaintiff,

Case No. 2:21-cv-1179

v.

CITY OF WAUWATOSA,  
OFFICER JOSEPH ANTHONY MENSAH,  
in his individual capacity, and  
FORMER CHIEF OF POLICE BARRY WEBER,  
in his Official capacity,

Defendants.

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**DECLARATION OF JASMYNE M. BAYNARD**

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Jasmyne M. Baynard, being first duly sworn under oath, declares and states as follows:

1. I am an attorney licensed to practice law in the State of Wisconsin and am an attorney with Gunta Law Offices, S.C., which represents the Defendants in this matter.
2. I make this Declaration on personal knowledge and my review of various documents.
3. Prior to filing this Motion, the parties met and conferred on February 16, 2022, in good faith in an effort to resolve these discovery disputes.
4. Attached as Baynard Declaration **Exhibit A** is a true and accurate copy of Defendants' February 10, 2022, e-mail to Plaintiff.
5. Attached as Baynard Declaration **Exhibit B** is a true and accurate copy of Defendants' February 24, 2022 e-mail to Plaintiff.

6. Attached as Baynard Declaration **Exhibit C** is a true and accurate copy of Plaintiff's February 28, 2022 e-mail and attached Notice of Deposition.

7. Attached as Baynard Declaration **Exhibit D** is a true and accurate copy of Defendants' March 6, 2022 e-mail to Plaintiff.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on March 9, 2022.

*/s/ Jasmyne M. Baynard*  
Jasmyne M. Baynard